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District of Arizona

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Salvador LUNES-Hernandez,
aka: Salvador De La Cruz-Lunez,

Defendant.

19-33822M - LAB

**MOTION TO DISMISS COMPLAINT
AND VACATE CONVICTION**

Pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, 18 U.S.C. §5031 et seq., and by leave of Court, the United States Attorney for the District of Arizona, through undersigned counsel hereby moves the court to dismiss the above-captioned complaint with prejudice and vacate the conviction against the above-named defendant. The government requests an order immediately releasing the defendant from further custody in this criminal matter.

Respectfully submitted this 9 September 2019.

MICHAEL BAILEY
United States Attorney
District of Arizona
/ss/ Christopher J. Lewis
Special Assistant U.S. Attorney

Copy of the foregoing served electronically or by other means,
this 9 September 2019 to:

Attorney for Defendant: Vincent L. Lacsamana, Esq.